

**From:** [PETERSON Jenn L](#)  
**To:** [Burt Shephard/R10/USEPA/US@EPA](#); [Robert Neely](#)  
**Cc:** [Bob Dexter](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [James Meador](#); [Jeremy Buck](#); [Joe Goulet/R10/USEPA/US@EPA](#); [Jennifer Peers](#); [Katherine Pease](#); [Nancy Beckvar](#); [Nancy Munn](#); [Robert Gensemer](#); [Robert Neely](#); [Rose Longoria](#); [ANDERSON Jim M](#)  
**Subject:** RE: NOAA comments on first batch of TRVs  
**Date:** 07/29/2008 09:06 AM

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Burt,

I am still a little unclear on when the additional screening is to take place. Is it EPA's intention to get the LWG those additional TRVs (based on the Round 3 screen) so they can be incorporated into the Draft RI? Is EPA completing the Round 3 screen now or having the LWG provide this for review? I think having a complete COC list is important to have sooner rather than later, for derivation of TRVs and also to inform the PRG process that is happening concurrently. Also, looking at the Round 3 data changes some of the conclusions on whether we would be developing invertebrate only or fish and invertebrate TRVs for some chemicals.

-Jennifer

-----Original Message-----

From: Shephard.Burt@epamail.epa.gov  
[mailto:Shephard.Burt@epamail.epa.gov]  
Sent: Monday, July 28, 2008 4:48 PM  
To: Robert Neely  
Cc: Bob Dexter; humphrey.chip@epa.gov; Blischke.Eric@epamail.epa.gov; James Meador; Jeremy Buck; Goulet.Joe@epamail.epa.gov; Jennifer Peers; Katherine Pease; Nancy Beckvar; Nancy Munn; PETERSON Jenn L; Robert Gensemer; Robert Neely; Rose Longoria  
Subject: Re: NOAA comments on first batch of TRVs

Rob,

The TRVs for the BERA are based on residue-effects data from the literature, and thus are independent of the Round 3 or any other site specific data that represents exposure to site contaminants.

The ecological risk assessment process for the Round 3 data is the same as that for Round 1 and 2 data. Round 3 data will be screened against the same screening level benchmarks used with the Rounds 1 and 2 data. Round 3 data that fails the screen will be evaluated in more detail during the BERA. If one or more chemicals from Round 3 tissues screen in using the screening level benchmarks for which we've not derived BERA tissue TRVs, those additional chemical TRVs will have to be derived before additional risk assessment of the Round 3 tissue data can be completed in the BERA.

Best regards,

Burt Shephard  
Risk Evaluation Unit  
Office of Environmental Assessment (OEA-095)  
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"When the data changes, I change my mind. What do you do?"  
- John Maynard Keynes

Robert Neely  
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07/28/2008 04:40 PM

To  
[Chip Humphrey/R10/USEPA/US@EPA](#),  
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<jeremy\_buck@fws.gov>, Rose  
Longoria <rose@yakama.com>  
Subject  
NOAA comments on first batch of  
TRVs

Hey Chip and Eric,

Our comments on the first batch of TRVs are attached. Primarily focused on cadmium, which is the one we were really able to get to.

I suppose the other thing is I'm not real clear on how the R3 data are being or will be considered in the development of tissue TRVs. Perhaps we can discuss on the TCT?

Thanks,

-R

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Robert Neely  
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Please note: I generally alternate work locations between EPA and NOAA on a weekly basis.

(See attached file: NOAACommentstoEPATRVsBatchOneFinal072808.pdf)(See attached file: robert\_neely.vcf)